## **REMARKS**

Claims 1-45 are pending in this application. Claims 1-3, 25, 33 and 43 have been amended, claims 46-48 have been added and claims 21-22 have been canceled by the present Amendment. Amended claims 1-3, 25, 33 and 43 and new claims 46-48 do not introduce any new subject matter.

The present invention relates to a display device. According to an embodiment of the invention, the display device includes a connector for electrically coupling at least one of two or more displays to a bus when the display is supported by an assembly housing, wherein the connector is positioned on a member for physically coupling the display to the assembly housing. <u>See, e.g.,</u> Fig. 5.

According to an embodiment of the present invention, the display device includes a first bag for receiving media and the assembly housing, and a second bag for receiving the display when the display is operated while being remote from the assembly housing, wherein the second bag is adapted to attach to an interior element of the vehicle at a position remote from the first bag.

According to an embodiment of the present invention, the display device includes a wireless transmitter operatively coupled to a media source for respectively and wirelessly transmitting a video signal to two or more displays, and each of the two or more displays includes a wireless receiver for wirelessly receiving the video signal.

## REJECTIONS UNDER 35 U.S.C. § 102(b)

Reconsideration is respectfully requested of the rejection of claims 1-2, 4-8, 11-16, 18-20 and 23-24 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No.

<sup>&</sup>lt;sup>1</sup> Applicants note that the Examiner has not provided any explanation for the rejection of claims 11 and 12 under 35 U.S.C. § 102(b). Accordingly, Applicants note that the stated rejection of claims 11-

5,794,164 ("Beckert"), claims 21-22 having been deleted.

In rejecting claims 1-2, 4-8, 11-16 and 18-24 under 35 U.S.C. § 102(b), the Examiner states that Beckert teaches the display device claimed therein, including a "connector for electrically coupling said at least one of said two or more displays to said bus". July 2, 2003 Office Action at 3.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." <a href="Verdegaal Bros. v. Union Oil Co. of California">Verdegaal Bros. v. Union Oil Co. of California</a>, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the . . . claim." <a href="Richardson v. Suzuki Motor Co.">Richardson v. Suzuki Motor Co.</a>, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989); M.P.E.P. § 2131.

Applicants respectfully submit that claims 1-2, 4-8, 11-16, 18-20 and 23-24 as amended are not anticipated by Beckert. Beckert does not disclose or suggest a connector for electrically coupling at least one of two or more displays to a bus when the display is supported by an assembly housing, wherein the connector is positioned on a member for physically coupling the display to the assembly housing, as recited in amended claim 1. This feature is neither expressly nor inherently disclosed or suggested in the cited reference. Indeed, Beckert teaches away from this feature by disclosing a physical coupling assembly 50 independent of a separate electrical interface 82. See col. 4, lines 47-55 and col. 6, lines 39-48; see also Figs. 2 and 3. In contrast, in an embodiment of the present invention, a connector for electrical coupling is integrated with a member for physical connection of the display to the assembly

<sup>16</sup> may be a typographical error, wherein Examiner meant to reject claims 13-16 under 35 U.S.C. § 102(b) instead of claims 11-16.

housing. Further, as recited in amended claim 2, the connector allows for selective coupling and decoupling of the display to and from the bus and the assembly housing.

Because Beckert does not disclose or suggest the connector recited in independent claim 1, Applicants respectfully submit that independent claim 1 is not anticipated by Beckert. Claims 2, 4-8, 11-16, 18-20 and 23-24 ultimately depend from claim 1, which, for the reasons stated hereinabove, is submitted not to be anticipated by the cited reference. For at least those very same reasons, claims 2, 4-8, 11-16, 18-20 and 23-24 are also submitted not to be anticipated by the cited reference, claims 21 and 22 having been canceled. Therefore, Applicants respectfully request that the Examiner withdraw her rejection of claims 1-2, 4-8, 11-16, 18-20 and 23-24 under 35 U.S.C. § 102(b).

## REJECTIONS UNDER 35 U.S.C. § 103(a)

Reconsideration is respectfully requested of the rejection of claims 3 and 9-12 under 35 U.S.C. § 103(a) as being unpatentable over Beckert in view of U.S. Patent No. 6,339,696 ("Chan et al."), claim 22 having been canceled. Applicants respectfully submit that the amendment made to independent claim 1 renders claims 3 and 9-12 patentable over the cited references.

Applicants respectfully submit that Beckert, when taken alone or in combination with Chan et al., fails to teach or suggest the connecting member for electrically and physically coupling at least one of two or more displays to a bus and to the assembly housing, respectively, as recited in amended claim 1.

As stated above, Beckert teaches away from such a configuration. Furthermore, Chan et al., which relates to an in-vehicle audio/video system, contains no teaching

regarding the physical and electrical connection between a display and an assembly housing, nor does it show a display capable of being decoupled and operating remote from the assembly housing, as recited in claim 1.

Therefore, it is respectfully submitted that the cited references, when taken alone or in combination, do not disclose or suggest the connector configuration, as defined in newly amended claim 1. It is respectfully submitted that it would not have been obvious to modify Beckert, in view of Chan et al., to develop the connecting device of an embodiment of the present invention, for at least that reason that Beckert teaches away from such a configuration and Chan et al. is silent regarding such a configuration.

Applicants respectfully submit that an embodiment of the invention, as defined in amended claim 1, is patentable over Beckert, in view of Chan et al. Because claims 3 and 9-12 depend from claim 1, claims 3 and 9-12 are also submitted to be patentably distinct over the cited references, claim 22 having been canceled. As such, Applicants request that the Examiner withdraw her rejection of claims 3 and 9-12 under 35 U.S.C. §103(a).

Reconsideration is respectfully requested of the rejection of claim 17 under 35 U.S.C. § 103(a) as being unpatentable over Beckert. Applicants respectfully submit that the amendment made to independent claim 1 renders claim 17 patentable over the cited reference.

As argued above, Applicants respectfully submit that Beckert fails to teach or suggest the connector, as recited in amended claim 1. Because claim 17 depends from claim 1, claim 17 is submitted to be patentably distinct over the cited reference. As such, Applicants request that the Examiner withdraw her rejection of claim 17 under 35 U.S.C. §103(a).

Reconsideration is respectfully requested of the rejection of claims 25-32, 33-37, 39 and 41-43 under 35 U.S.C. § 103(a) as being unpatentable over Beckert in view of U.S. Patent No. 6,283,299 ("Lee").

Applicants respectfully submit that Beckert, when taken alone or in combination with Lee, fails to teach or suggest a connecting member for electrically coupling and physically coupling at least one of said two or more displays to a bus and to an assembly housing, respectively, as recited in amended claim 25.

As argued above, Beckert teaches away from such a configuration. Similarly, Lee also teaches away from such a configuration. Lee relates to a carrier and presentation bag for configuring a media player and a display to provide in-vehicle entertainment. Lee shows a display mounted on a support positioned on the bag. In contrast to the connecting member claimed in the present invention, Lee teaches the use of Velcro to physically hold the display in place and wires to electrically connect the display to the media player. See Lee, Figs. 2 and 4. The configuration in Lee, therefore, teaches away from a connecting member for physical and electrical connection of the display to the assembly housing, as recited in amended claim 25.

Also, Applicants respectfully submit that Beckert, when taken alone or in combination with Lee, fails to teach or suggest a first bag for receiving media and the assembly housing, and a second bag for receiving the display when the display is operated while being remote from the assembly housing, wherein the second bag is adapted to attach to an interior element of the vehicle at a position remote from the first bag, as recited in amended claim 33.

In rejecting the claim 33-37, 39 and 41-43, the Examiner states that "these claims are rejected for the reasons given in the scope of claims 25-32 as disclosed in

details above." July 2, 2003 Office Action at 10. However, Applicants respectfully submit that the Examiner failed to consider that at least the second bag for holding the display when remote from the assembly housing, renders claim 33 patentable over the cited references.

Beckert discloses a monitor remotely located from a computer, but suggests movably mounting the monitor on a stand or a yoke, not in a bag. <u>See col. 5</u>, lines 17-21. Lee relates to a single bag for housing a media player on which a display is placed, but does not disclose or suggest a second bag which can house the display in another part of the vehicle remote from the first bag and the assembly housing. Therefore, Applicants respectfully submit that Beckert, when taken alone or in combination with Lee, fails to teach or suggest the second bag, as recited in original claim 33.

Therefore, it is respectfully submitted that the cited references, when taken alone or in combination, do not disclose or suggest the connecting member or the use of a second bag, as defined in newly amended claims 25 and 33, respectively. Therefore, it is respectfully submitted that it would not have been obvious to modify Beckert, in view of Lee, to develop the configurations recited in independent claims 25 and 33.

Applicants respectfully submit that the embodiments of the invention as defined in amended claims 25 and 33 are patentable over Beckert, in view of Lee. Because claims 26-32 depend from claim 25 and claims 34-37, 39 and 41-43 depend from claim 33, claims 26-32, 34-37, 39 and 41-43 are also submitted to be patentably distinct over the cited references. As such, Applicants request that the Examiner withdraw her rejection of claims 25-32, 33-37, 39 and 41-43 under 35 U.S.C. §103(a).

Reconsideration is respectfully requested of the rejection of claims 38, 40 and 44-45 under 35 U.S.C. § 103(a) as being unpatentable over Beckert in view of Lee and

Chan et al. Applicants respectfully submit that independent claim 33, as amended is patentable over the cited references and, as a result, claims 38, 40 and 44-45, which depend from claim 33 are also patentable over the cited references.

As argued above, Applicants respectfully submit that Beckert, when taken alone or in combination with Lee fails to teach or suggest the second bag, as recited in claim 33. The addition of Chan et al. does not change this result. Chan et al. shows a display attached to an assembly housing, but does not disclose or suggest a display positioned in a second bag remote from the assembly housing. See Chan et al., Fig. 8.

Because claims 38, 40 and 44-45 depend from claim 33, claims 38, 40 and 44-45 are submitted to be patentably distinct over the cited references. Therefore, Applicants request that the Examiner withdraw her rejection of claims 38, 40 and 44-45 under 35 U.S.C. §103(a).

Applicants submit new claims 46-48 for consideration. New claim 46 depends from claim 25. As argued above, claim 25 is submitted to be patentable over the cited references. Accordingly, claim 46, which depends from claim 25, is also submitted to be patentably distinct over the cited references. Further, claim 46 includes the limitation that the connecting member allows for selective coupling and decoupling of at least one of the two or more displays to and from the bus and the assembly housing. This feature is neither disclosed nor suggested by the cited references. Therefore, new claim 46 is submitted to be patentably distinct over the cited references.

New claims 47 and 48 recite a wireless transmitter operatively coupled the media source for wirelessly transmitting video signals from the media source to the two or more displays, wherein each of the two or more displays includes a wireless receiver for wirelessly receiving the video signals. Applicants respectfully submit that wireless

transmission and reception of <u>video</u> signals is not disclosed or suggested by the cited references. Further, Applicants respectfully submit that displays including wireless receivers for receiving video signals are not features disclosed or suggested by the cited references.

As admitted by the Examiner, Beckert and Lee fail to address a wireless transmitter for wirelessly transmitting a video signal and a wireless receiver in the display for receiving same. July 2, 2003 Office Action at 6-7, 10. The Examiner relies on Chan et al. for curing these deficiencies. However, Chan et al. teaches away from this feature. Chan et al. teaches transmission of an <u>audio</u> signal to a wireless radio frequency receiver, but fails to show wireless transmission of a video signal from a video player to a wireless receiver in a display. Indeed, Chan et al. illustrates and explains a <u>physical</u> connection between the video player and display for transmission of video signals to the display. <u>See</u> col. 5, lines 13-32 and Fig. 1. Therefore, Applicants respectfully submit that Chan et al. fails to cure these deficiencies in Beckert and Lee. Accordingly, Applicants respectfully submit that new claims 47-48 (and originally filed claims 11, 38 and 44 which also recite wireless transmitters for wireless transmission of video signals) are patentable over the cited references.

Because new claims 46-48 include features which are not taught by the cited references, Applicants respectfully request that the Examiner accept and allow new claims 46-48.

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An early and favorable reconsideration is earnestly solicited. If the Examiner has any further questions or comments, it is suggested that she telephone Applicants' Attorney to reach a prompt disposition of this application.

Respectfully submitted,

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